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13 Children's Law Center of Los Angeles and Lloyd Bedell

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 Alexander B. Kasdan,
17 Plaintiff,

18 v.

19 COUNTY OF LOS ANGELES;
20 Timmie Saltzman, an individual;
21 Priscilla Ashburn, an individual;
22 Rosita Brennan, an individual; Ebony
23 Crow, an individual; Pauline Davis, an
24 individual; Pamela Burris, an
25 individual; Yolanda Johnson, an
26 individual; Thelma Gadson, an
27 individual; Julie Glazner, an
28 individual; Jamie Hein, an individual;
Belinda Marquez, an individual;
Eleazer Christian Degbor, an
individual; Barbara Smith, an
individual; Catherine Woillard, an
individual; Lisa Margolis, an
individual; Natalie Abrahams, an
individual; Children's Law Center of
Los Angeles, an entity of unknown
form; Lloyd Bedell, an individual; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 12-CV-06793 GAF (JEMx)

Assigned To The Honorable Gary A.
Feess

**DEFENDANTS CHILDREN'S LAW
CENTER OF LOS ANGELES AND
LLOYD BEDELL'S REPLY IN
SUPPORT OF THEIR MOTION TO
LIFT STAY**

Date: February 24, 2014
Time: 9:30 a.m.
Ctmm: 740

Date Action Filed: August 7, 2012

1 Plaintiff Alexander Kasdan ("Plaintiff") and Defendants Children's Law Center of
 2 Los Angeles and Lloyd Bedell (collectively "Defendants") agree that the Court should
 3 lift the stay put in place by its April 30, 2013 Order. (ECF Nos. 43, 49, 52.) Moreover,
 4 they agree that the Court has already ruled on the following issues raised at the motion
 5 to dismiss stage: (1) Defendants' argument with respect to the "domestic relations"
 6 exception to subject matter jurisdiction; and (2) the applicability of the *Rooker-Feldman*
 7 doctrine, which the parties briefed pursuant to the Court's Order requesting Plaintiff to
 8 show cause why the case should not be dismissed for lack of subject matter jurisdiction.
 9 (ECF No. 44.)

10 However, the Court's April 30, 2013 Order did not address Defendants'
 11 arguments that Plaintiff failed to state a claim under 42 U.S.C. § 1983 and that Plaintiff
 12 cannot satisfy the causation requirement under 42 U.S.C. § 1983. (ECF No. 33-1 at 12-
 13 18; ECF No. 43.)

14 Accordingly, Defendants respectfully request that the Court lift the stay and
 15 address the unresolved arguments raised in Defendants' Motion to Dismiss Plaintiff's
 16 First Amended Complaint. (ECF Nos. 33-34.)

17
 18 Dated: January 30, 2014

AKIN GUMP STRAUSS HAUER & FELD LLP

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 20 By /s/ Amjad M. Khan
 21 Amjad M. Khan
 22 Attorney for Defendants Children's Law Center and
 23 Lloyd Bedell
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